

FITCHBURG GAS AND ELECTRIC LIGHT COMPANY

D.T.E. 99-118

FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
FITCHBURG GAS AND ELECTRIC LIGHT COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c) the Department of Telecommunications and Energy ("Department") submits to Fitchburg Gas and Electric Light Company ("Fitchburg" or the "Company") the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to Fitchburg in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Fitchburg or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, Jeff Hall and Paul Osborne of the Department's Rates and Revenue Division, and submit four (4) copies of the responses to Robert J. Howley, Hearing Officer, on three hole punch paper.

Questions

The following questions relate specifically to the Company's electric operations unless specified otherwise.

DTE-1-1 Refer to Page 227 of the Company's FERC Form 1 for 1999. Please provide a monthly breakdown of Account 151, "Fuel Stock," and Account 152, "Fuel Stock Expenses Undistributed" for the months December 1998 through December 1999. As part of this response, please break down the monthly fuel stock for both accounts between electric and gas operations.

DTE-1-2 Refer to Page 227 of the Company's FERC Form 1 for 1999. Please provide a monthly breakdown of Account 154, "Plant Materials and Operating Supplies" for the months December 1998 through December 1999. As part of this response, please break down this entry between electric and gas operations.

DTE-1-3 Refer to Page 227 of the Company's FERC Form 1 for 1999. Please provide a monthly breakdown of Account 163, "Stores Expense Undistributed" for the months December 1998 through December 1999. As part of this response, please break down this entry between electric and gas operations.

DTE-1-4 Please confirm, or correct as necessary, that the Company sold its investment in New Haven Harbor generating station to United Illuminating effective on or about April 14, 1999, pursuant to D.T.E. 98-121 issued on March 31, 1999.

DTE-1-5 Please provide the following expenses for 1999 related to the New Haven Harbor generating station, providing all workpapers, calculations, assumptions, etc. as a basis in responding to this request:

- (1) operation and maintenance expense;
- (2) depreciation expense;
- (3) deferred income taxes; and
- (4) property taxes.

DTE-1-6 Please confirm, or correct as necessary, that the Company sold its investment in Wyman 4 to Select Energy effective on or about February 1, 2000, pursuant to D.T.E. 99-58, issued December 28, 1999.

DTE-1-7 Please provide the following plant information as of December 31, 1999 for the Company's investment in the Wyman 4 generating station, providing all workpapers, calculations, assumptions, etc. as a basis in responding to this request:

- (1) gross book value;
- (2) accumulated depreciation; and
- (3) accumulated deferred income taxes

DTE-1-8 Please provide the following expenses for 1999 related to Wyman 4, providing all workpapers, calculations, assumptions, etc. as a basis in responding to this request:

- (1) operation and maintenance expense;
- (2) depreciation expense;
- (3) deferred income taxes; and
- (4) property taxes.

DTE-1-9 Please provide the cash working capital allowance factor for fuel and purchased power expense proposed in D.P.U. 84-145.

DTE-1-10 Refer to Page 112 of the Company's FERC Form 1 for 1999. Please provide a breakdown between gas and electric operations of the \$263,169 in Account 235, "Customer Deposits."

DTE-1-11 Refer to Page 113 of the Company's FERC Form 1 for 1999. Please provide a breakdown between gas and electric operations of the \$1,070,591 in Account 252, "Customer Advances for Construction."